

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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CHRISTOPHER HOEY,

Plaintiff,

12-cv-04935 (GRB)

-against-

COUNTY OF NASSAU,

**PLAINTIFF'S
PROPOSED VOIR DIRE
QUESTIONS**

Defendant.

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Rather than reiterate the standard jury questions, which plaintiff is confident that the Court already plans on asking during jury selection, plaintiff submits the following brief list of additional jury questions, which we respectfully request be included during voir dire in this matter:

1. Have you or anyone close to you ever suffered from depression, anxiety, emotional distress, or mental illness of any kind?
2. Have you or anyone close to you ever received medical attention or counseling for depression, anxiety, emotional distress, or mental illness of any kind? If so, was the medical attention or counseling helpful?
3. Have you, anyone in your family, or anyone close to you used medication to treat emotional or psychological problems? If so, was the medication was helpful?
4. Do you think that mental illness can be controlled or overcome with proper medication and medical attention?
5. Have you or anyone close to you ever taken any courses or training in or worked in the field of mental health or with people who have mental health issues?

6. Do you know anyone who may have had or has been diagnosed as having bi-polar disorder?
7. Have you ever had any experience with a discrimination claim, whether it was filed by you, against you or by someone in a company for which you worked? If so, tell us about it.

Dated: April 15, 2019
Carle Place, New York

Respectfully submitted,

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